

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ROBIN JOHNSON d/b/a CG JOHNSON &  
COMPANY; JAMES QUINN; FAHMIA, INC.; and  
PRINZO & ASSOCIATES, LLC; individually and on  
behalf of all others similarly situated,

Plaintiffs,

v.

JPMORGAN CHASE BANK, N.A., doing business  
as CHASE BANK; JPMORGAN CHASE & CO.;  
and DOES 1 through 100,

Defendants.

20-cv-4100 (JSR)

JAMES QUINN, individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

SIGNATURE BANK; and DOES 1 through 100,

Defendants.

20-cv-4144 (JSR)

FAHMIA, INC., individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

MUFG AMERICAS HOLDING CO.; MUFG  
UNION BANK, N.A.; and DOES 1 through 100,

Defendants.

20-cv-4145 (JSR)

FAHMIA, INC., individually and on behalf of all  
others similarly situated,

Plaintiff,

v.

CITIBANK, N.A.; CITIGROUP INC.; and DOES 1  
through 100,

Defendants.

20-cv-4146 (JSR)

ROBIN JOHNSON d/b/a CG JOHNSON &  
COMPANY; JAMES QUINN; FAHMIA, INC.; and  
PRINZO & ASSOCIATES, LLC, individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

JPMORGAN CHASE BANK, N.A., d/b/a CHASE  
BANK; and JP MORGAN CHASE & CO.,

Defendants.

20-cv-4858 (JSR)

**NOTICE OF JOINT MOTION  
TO DISMISS FOR FAILURE TO  
STATE A CLAIM AND LACK  
OF SUBJECT-MATTER  
JURISDICTION**

PLEASE TAKE NOTICE that upon (i) the Joint Memorandum of Law in Support of Defendants' Motion to Dismiss for Failure to State a Claim and Lack of Subject-Matter Jurisdiction, along with the accompanying Declaration of Andrew Soukup and the exhibits thereto and the Declaration of Sylvia E. Simson and the exhibit thereto, (ii) Defendants MUFG Americas Holdings Corporation and MUFG Union Bank, N.A.'s Supplemental Memorandum of Law in Further Support of their Motion to Dismiss, along with the accompanying Declaration of Kirsten Hakes and the exhibits thereto, the Declaration of Ernesto Ibarra, and the Declaration of Ashley M. Simonsen and the exhibits thereto, (iii) Defendant Signature Bank's Supplemental Memorandum of Law in Further Support of its Motion to Dismiss, and (iv) all prior papers and

proceedings herein, all Defendants in the above-captioned cases, by their undersigned counsel, shall move the Court, before the Honorable Jed S. Rakoff, Courtroom 14B, at the Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, New York, NY, at oral argument currently set for 11:00 a.m. on August 7, 2020, for an order (i) dismissing, pursuant to Rule 12(b)(1) of the Federal Rules of Civil Procedure, the claims asserted by Plaintiffs Fahmia Inc. and Prinzo & Associates, LLC against Defendants JPMorgan Chase Bank, N.A., JPMorgan Chase & Co, Citibank, N.A., Citigroup Inc., MUFG Union Bank, N.A., and MUFG Americas Holdings Corporation, and (ii) dismissing with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure, all other claims asserted by all Plaintiffs in their Complaints.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's June 23, 2020 Order (Dkt. 35), Plaintiffs' opposition papers, if any, must be served and filed on or before July 24, 2020, and Defendants' reply papers, if any, must be served and filed on or before July 31, 2020.

Dated: July 10, 2020

Respectfully submitted,

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*\* Signature used with permission pursuant to  
SDNY ECF Rule 8.5(b)*